

MOLLIE HARTMAN LUSTIG (NJ ID 000862011)
CHASAN LAMPARELLO MALLON & CAPPUZZO, PC

300 Lighting Way

Secaucus, New Jersey 07094

P: 201-348-6000

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Attorneys for Plaintiff Amaran. Abdoul Aziz Wereme

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMARAN. ABDOUL AZIZ WEREME, on
behalf of himself and all others
similarly situated,

Plaintiff,

v.

AMERICAN EAGLE EXPRESS, INC.
d/b/a AEX Group.,

Defendant.

CIVIL ACTION

No.: 2:20-cv-05616-ES-MAH

EVER BEDOYA, DIEGO GONZALES, and
MANUEL DeCASTRO, on behalf of
themselves and all others
similarly situated,

Plaintiffs,

v.

AMERICAN EAGLE EXPRESS, INC.
d/b/a AEX Group,

Defendant.

CIVIL ACTION

No.: 2:14-cv-02811-ES-JAD

PLAINTIFF AMARAN. ABDOUL AZIZ WEREME'S NOTICE OF
MOTION TO CONSOLIDATE 2:20-CV-05616-ES-MAH WITH
2:14-CV-02811-ES-JAD PURSUANT TO FED R. CIV. P.
42(A) AND APPOINT CHASAN LAMPARELLO MALLON &
CAPPUZZO AS INTERIM CO-LEAD COUNSEL PURSUANT TO
FED R. CIV. P. 23(G)

Motion Return Date: December 24, 2020

Oral Argument: Requested if timely
opposition papers are submitted to the
Court.

To: R. Andrew Santillo, Esq.
Winebrake & Santillo, LLC
Twining Office Center, Suite 211
715 Twining Road
Dresher, Pennsylvania 19025

Harold Lichten, Esq.
Matthew Thomson, Esq.
LICHTEN & LISS RIORDAN, P.C. 100 Cambridge
Street, 20th Floor Boston, Massachusetts
02114

Attorneys for Plaintiff Ever Bedoya, et al.
in the 2:14-cv-02811-ES-JAD action

On Notice To: Joseph C. DeBlasio, Esq.
Pooja Bhutani, Esq.
JACKSON LEWIS, P.C.
766 Shrewsbury Avenue, Suite 101
Tinton Falls, New Jersey 07724

Attorneys for Defendant, American Eagle
Express, Inc., d/b/a AEX Group in the 2:20-
cv-05616-ES-MAH and 2:14-cv-02811-ES-JAD
actions

PLEASE TAKE NOTICE that on December 24, 2020 at 9:00am, or as soon as counsel may be heard, Plaintiff Amaran. Abdoul Aziz Wereme shall move before the United States District Court, District of New Jersey, for an Order consolidating Wereme et al. v. American Eagle Express, Inc. d/b/a AEX Group, 2:20-cv-05616-ES-MAH and Ever Bedoya et al. v. American Eagle Express, Inc. d/b/a AEX Group, 2:14-cv-02811-ES-JAD for adjudication of common questions of law and fact, and for other and further relief as the Court deems just and proper pursuant to Federal Rules of Civil Procedure 42(a); and, to be named as Interim Co-Lead Counsel pursuant to Fed.R.Civ.P. 23(g) (3).

PLEASE TAKE FURTHER NOTICE that Plaintiff Wereme shall rely on the Memorandum of Law and Certification of Counsel, dated November 30, 2020 which are being filed contemporaneously with this Notice of Motion.

Respectfully submitted,

By: /s/ Mollie Hartman Lustig
Mollie Hartman Lustig

Dated: November 30, 2020

CERTIFICATION OF SERVICE

I hereby certify that on November 30, 2020, this Motion to Consolidate and Appoint Chasan Lamparello Mallon and Cappuzzo, P.C. as Interim Co-Lead Counsel, together with supporting Brief and Certification were filed with the Clerk of the United States District Court for the District of New Jersey and served electronically upon all counsel of record via ECF.

Respectfully submitted,

By: /s/ Mollie Hartman Lustig
Mollie Hartman Lustig

Dated: November 30, 2020